

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT INDIANA
SOUTH BEND DIVISION**

MALIBU MEDIA, LLC,)	
)	
Plaintiff,)	Civil Case No. 3:13-cv-00163-TLS-CAN
)	
v.)	
)	
HAI NGUYEN,)	
)	
Defendant.)	
_____)	

**PLAINTIFF’S MOTION FOR EXTENSION OF TIME
WITHIN WHICH TO SERVE EXPERT WITNESS REPORTS**

Plaintiff, Malibu Media, LLC, moves for entry of an order extending the time within which it has to serve its Expert Witness Reports on Defendant, and states:

1. Pursuant to this Court’s Order entered on September 13, 2013 [CM/ECF 18], Plaintiff is required to disclose its experts and serve its experts’ reports on Defendant by no later than today, December 12, 2013.

2. Plaintiff served its Expert Witness List and Partial Report on Defendant today, December 12, 2013. However, Plaintiff’s expert is unable to prepare his report because Plaintiff’s has yet to request a copy of Defendant’s hard drive. Plaintiff will do so in its initial discovery requests, which are being served on Defendant today.

3. As such, Plaintiff requires an extension of at least sixty (60) days within which its expert may review any information produced by Defendant in response to the discovery requests, and complete his report.

4. This request is made in good faith and not made for the purpose of undue delay.

WHEREFORE, Plaintiff respectfully requests that the time within which it must serve its expert reports on Defendant be extended by sixty (60) days, or until February 10, 2014.

Dated: December 12, 2013

Respectfully submitted,

NICOLETTI & ASSOCIATES, PLLC

By: /s/ Paul J. Nicoletti
Paul J. Nicoletti, Esq. (P44419)
36880 Woodward Ave, Suite 100
Bloomfield Hills, MI 48304
Tel: (248) 203-7800
Fax: (248) 203-7801
E-Fax: (248) 928-7051
Email: paul@nicoletti-associates.com
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on December 12, 2013, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record or pro se parties identified on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

SERVICE LIST

Hai Nguyen
315 15th Street
Logansport, IN 46947
longhai@nyc.com
Pro se

By: /s/ Paul J. Nicoletti